

**AMERICAN OPTICAL CORPORATION**

80 FIELD POINT ROAD, GREENWICH, CT 06830



SDMS DocID

2197035

**ORIGINAL**

November 7, 2012

**VIA FEDERAL EXPRESS**

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: Response to Section 104(e) Request for Information of American Optical –  
Safety Light Corporation Superfund Site - Bloomsburg, PA**

Dear Mr. Steinmetz:

American Optical Corporation (“AO” or “Respondent”) provides the following response to the United States Environmental Protection Agency’s (“EPA”) request for information issued pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (“CERCLA”), 42 U.S.C. Section 9604(e) (“Request”). EPA’s undated Request was received by Respondent on or about September 26, 2012. AO requested and EPA agreed to extend the time period for AO to respond to the Request up to and including November 12, 2012; that agreement was confirmed by e-mail from Humane Zia dated October 5, 2012. Consequently, this response is provided timely.

The Request was issued to “American Optical, 529 Ashland Avenue, Suite 3, Southbridge, MA 01550.” This response is provided by American Optical Corporation, a corporation organized under the laws of the State of Delaware with an office at 100 Mechanic Street, Southbridge, MA 01550.

While the Request seeks information for the time period of 1945 to the present, AO was not formed until December 13, 1966. Consequently, Respondent has no information responsive to the Request prior to that date.

The Request refers to certain documents obtained from the United States Radium Corporation/Safety Light Corporation. These documents are appended to the Request as Enclosure 4 and the Request states that these documents suggest a business arrangement between Safety Light Corporation and AO in the 1960’s (hereinafter the “United States Radium Corporation Documents”). The United States Radium Corporation Documents are the only documents and only source of information AO has suggesting any business relationship between AO and Safety Light or its affiliates. Following internal review and investigations, to the best of its knowledge, AO has no information or documents in its possession or control responsive to the Request, other than those documents EPA appended to the Request and provided to AO. Consequently, in the responses below, AO

refers to the United States Radium Corporation Documents as the only source of any information concerning any transactions between AO and Safety Light.

In accordance with the instructions in the Request, AO provides each numbered question followed by a response below.

### **SPECIFIC RESPONSES**

1. Other than the United States Radium Corporation Documents, Respondent has no information regarding any business relationship between AO and Safety Light.

2. Other than the United States Radium Corporation Documents, AO has no information on whether AO ever sent, transported, shipped or otherwise arranged for transportation or shipment of materials to the Site.

3. Other than the United States Radium Corporation Documents, AO has no information on whether it ever sent, transported, shipped or otherwise arranged for transportation or shipment of materials to the entities listed in Request No. 3.

4. See response above.

5. Other than the United States Radium Corporation Documents, AO has no information on whether it generated any waste disposed of or reclaimed by any of the entities listed in Request No. 5.

6. David G. Butler, (b) (6), former Director, Safety, Security and Environment, American Optical Corporation, was consulted in the preparation of these answers and is familiar with location of documents that might reflect Respondent's dealings with Safety Light Corporation or other entities named in the Request. Al Skott, a former Vice-President of American Optical Corporation, searched for documents that might relate to or be responsive to the Request. No documents were found.

7. The division of AO which in the 1960's sold the type of equipment described in the United States Radium Corporation Documents was transferred out of AO in approximately May 1982 and subsequently sold to Cambridge Instruments.

8. Respondent has no other information.

9. Other than the United States Radium Corporation Documents, Respondent has no other information regarding the Request.

Respectfully submitted,

AMERICAN OPTICAL CORPORATION

By: 

Maurice Cuniffe, Chairman